

325 Broadway · Suite 505 · New York, NY 10007 · 125 Half Mile Road · Suite 200 · Red Bank, NJ 07701 T: 646.253.0583 · F: 646.224.9618 · C: 732.642.0598 · E: JEC@cistarolawfirm.com www.cistarolawfirm.com

April 22, 2022

Sent via ECF

The Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square New York, NY 10007



Re: U.S. v. Lakeshia Garnett, 21 Cr. 414 (KPK)

Your Honor:

I write to respectfully request a temporary modification of Lakeshia Garnett's bond conditions. Ms. Garnett is currently on home detention with electronic monitoring and resides in Long Island, NY. We request that Ms. Garnett be permitted to attend the wake, funeral, and repast services for her grandmother who raised her after her mother passed away. Pretrial Services and the government consent to this application.

We propose the following schedule to permit Ms. Garnett to travel to/from each location on Tuesday, April 27, 2022 through Wednesday, April 28, 2022:

On April 27, 2022, at 11:30a.m., Ms. Garnett would leave her residence in Long Island, NY and travel to the funeral parlor, Manhattan Funeral Services, 300 104th Street, New York, NY 10029, for viewing services from 1p.m. – 6p.m. She would return to her residence by 7:30p.m.

On April 28, 2022, at 7:30a.m., Ms. Garnett would leave her residence and travel to the funeral parlor for the last viewing and church services. She will then travel to St. Raymond's Cemetery, 2600 Lafayette Ave., Bronx, NY 10465, for the burial services at 10:45a.m.

Also, on Wednesday, April 28, 2022, after the burial services, Ms. Garnett would travel to her cousin's residence for the repast with family and friends. Her cousin, Tynaisha Wan's address is 1368 Webster Ave., Apt. 17G, Bronx, NY 10456. Ms. Garnett respectfully requests to attend the repast until 8p.m. She would return to her residence by 9:30p.m.

In addition to this schedule, we request that Ms. Garnett be permitted to coordinate a date and time with Pretrial Services to travel to/from the Crown Monuments, 3271 East Tremont Ave., Bronx, NY 10461, to purchase a tombstone for her grandmother.



325 Broadway · Suite 505 · New York, NY 10007 · 125 Half Mile Road · Suite 200 · Red Bank, NJ 07701 T: 646.253.0583 · F: 646.224.9618 · C: 732.642.0598 · E: JEC@cistarolawfirm.com www.cistarolawfirm.com

Lastly, we request that Ms. Garnett be permitted to be in the presence of her codefendants, but not permitted to discuss the case.

For the Court's convenience, I have included a "So Ordered" line should the Court grant our request. Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro, Esq.

cc: All counsel (*via ECF*)

PTSO Mallori Brady (via electronic mail) PTSO Joshua Rothman (via electronic mail)

Application GRANTED. The Court extends its condolences to Ms. Garnett and her family.

SO ORDERED

Katherin Palle Faula

Honorable Katherine Polk Failla, U.S.D.J.

Dated: April 22, 2022

New York, New York